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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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November 22, 1991

CERTIFIED RETURN RECEIPT
P 074 978 826

Ms. Cindy Emmons
Director Environmental Affairs
Kennecott Utah Copper
P. O. Box 525
Bingham Canyon, Utah 84006-0525

Dear Ms. Emmons:

Re: Discussion of Reclamation Issues During Meeting Between Kennecott and
Division Staff on October 3, 1991, M/035/002, Salt Lake County, Utah

On October 3, 1991, Holland Shepherd and I met with Fred Fox and Don Deines of your staff, to discuss the resolution of several ongoing issues initiated by the Division in September of 1989. This letter addresses our understanding of the agreements made during our meeting and the specific time frames that were established for accomplishing various goals. Some of the items addressed in this letter will be post-dated upon the mailing date of this letter. However, the November dates will remain in effect, as these were the dates agreed upon during our October meeting. The following list outlines the items which were discussed.

1. **Maps** - Kennecott personnel indicated that a set of maps would be available by November 15, 1991. The maps will display areas disturbed by mining post May 1975. Also, the maps will display areas which have been reclaimed since May of 1975 (if the information is available by November 15, 1991, otherwise this information will be incorporated at another date). The Division has requested a small scale map(s) and a set of larger scale maps (please refer to the Division's 5/24/91 letter).

- 2-3-92
still waiting
2. **Topsoil Salvage** - The Division has asked that Kennecott identify areas from which topsoil has been and is being salvaged and the stockpile locations. A summary of these areas will be provided in the operator's annual report to be submitted by March 1, 1992. Kennecott has committed to continue to salvage topsoil from all areas where it is safe to do so. Kennecott has also agreed to draft topsoil stockpiling standards for our review.
- 3-3-92
still waiting
3. **Final Pit Closure** - Kennecott personnel have agreed to put together a conceptual list of closure items for the pit. The closure items would be directed at the elimination of public health and safety and environmental hazards posed by the pit. The list of items should be provided to the Division by March 1, 1991.
- 3-3-92
still waiting
4. **Evaluation of Waste Dump Materials** - Kennecott agreed to summarize any existing information pertaining to the characterization of waste dump materials. This information will be placed in the operator's annual report due by March 1, 1992. Though not discussed at the meeting, the Division is also interested in any available information characterizing the leached waste dump materials. The Division will evaluate the information and will make a determination as to whether or not supplemental information will be required.
5. **Design of Future and Active Waste Dumps** - Kennecott agreed to provide the Division with a summary of current waste dump design practices by November 15, 1991. As discussed during the on-site meeting on November 7, 1991, plans for changing the current dump design and development will be put on hold until further discussions can be made between the Division and operator. This will be an ongoing issue, which the Division will pursue.
- 3-3-92
still waiting
6. **Reclamation Techniques to be Used in This Years Reclamation Program** - Kennecott agreed to provide the Division with a status report of all the 1991 reclamation projects by November 15, 1991. Results from the various test plots and reclaimed areas will be provided in the operator's 1991 annual report, due March 1, 1992.

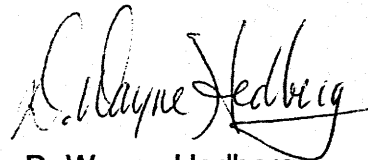
Page 3
Ms. Cindy Emmons
M/035/002
November 22, 1991

The Division has received Kennecott's response to those items required by the November 15, 1991 deadline. We appreciate your timely efforts in providing this information. The response is currently under our technical review.

During the meeting, we discussed the possibility of separating the Bingham Pit Mine Permit from that of the Modernization Project. This would eliminate some of the confusion when accessing information concerning a specific site, and would help in separating bonding and permitting issues, between the two sites. If Kennecott Management concurs with separate permit numbers, we will assign these sites new numbers accordingly.

Because the resolution of many of these issues has been outstanding for an extended length of time, the Division requests that Kennecott meet the established deadlines to remain in compliance. Thank you for your cooperation in addressing these permitting issues.

Sincerely,

A handwritten signature in cursive script, reading "D. Wayne Hedberg". The signature is written in dark ink and is positioned above the printed name and title.

D. Wayne Hedberg
Permitting Supervisor
Minerals Regulatory Program

jb
cc: Fred Fox, Kennecott
Lowell Braxton, DOGM
M035002.2